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9 UNITED STATES BANKRUPTCY COURT  
10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION  
11

12 In re  
13 THE LITIGATION PRACTICE GROUP P.C.,  
14 Debtor.  
15  
16  
17

Case No: 8-23-bk-10571-SC

Chapter 11

STIPULATION TO CONTINUE HEARING  
ON MOTION FOR ALLOWANCE OF  
ADMINISTRATIVE EXPENSE CLAIM  
FILED BY UNITED PARTNERSHIPS, LLC  
[DK. NO 671]

Current Hearing and Response Dates

Hearing Date: February 6, 2025

Trustee's Response Due: January 23, 2025

Reply by Claimant Due: January 30, 2025

Time: 11:00 a.m.

Ctrm: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

Proposed Hearing and Response Dates

Hearing Date: March 13, 2025

Trustee's Response Due: February 27, 2025

Reply by Claimant Due: March 6, 2025

Time: 11:00 a.m.

Ctrm: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

28 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,

1 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

2 Richard A. Marshack, the duly appointed Chapter 11 Trustee ("Trustee") for the estate  
3 ("Estate") of The Litigation Practice Group, P.C. ("Debtor" or "LPG") and liquidating trustee of the  
4 LPG Liquidation Trust (collectively, "Trustee"), and United Partnerships, LLC ("UP" and together  
5 with Trustee, "Parties") with regard to the following:

6 **RECITALS**

7 A. On March 20, 2023, the Debtor filed a voluntary petition under Chapter 11 of Title 11  
8 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States  
9 Bankruptcy Court for the Central District of California, Santa Ana Division.

10 B. On May 8, 2023, Richard A. Marshack was appointed as the Chapter 11 Trustee of  
11 the Estate. Docket No. 65.

12 C. On November 16, 2023, UP filed a Motion for Allowance of Administrative Claim  
13 Pursuant to 11 U.S.C. § 503 ("Motion"). Docket No. 671.

14 D. On January 5, 2024, Trustee filed a Motion to Continue Hearing on the motions for  
15 allowance of administrative expense claims. Docket No. 816.

16 E. On January 8, 2024, the Court entered an Order granting the Trustee's Motion to  
17 Continue Hearing, continuing the initial hearings on all matters to February 29, 2024, and treating  
18 those hearings as status conferences. Docket No. 818.

19 F. On February 15, 2024, Trustee filed an Omnibus Unilateral Report Regarding Status  
20 of Motions for Allowance of Administrative Expense Claim Under 11 U.S.C. Section 503(b).  
21 Docket No. 940.

22 G. On March 6, 2024, the Court entered a Scheduling Order, setting April 11, 2024, as  
23 the deadline for Trustee to respond to any of the motions for allowance of administrative expense  
24 claims for a specific group of claimants, including UP. Docket No. 986.

25 H. On April 4, 2024, the Parties entered into a Stipulation to Modify the Briefing  
26 Schedule and Continue Hearing on Motion for Allowance of Administrative Expense Claim filed by  
27 United Partnerships, LLC. ("April 4 Stipulation"). Docket No. 1087.

1 I. On April 5, 2024, the Court entered an order approving the April 4 Stipulation.

2 Docket No. 1089

3 J. Thereafter, the Court entered orders approving further stipulations between Trustee  
4 and UP to continue the hearing on the Motion. *See* Docket Nos. 1188, 1265, 1422, 1812, and 1940.

5 K. The hearing is currently scheduled for February 6, 2025, at 11:00 a.m.

6 L. The Trustee has continued to diligently investigate UP's claim. Trustee has requested  
7 further documentation from UP, specifically documentation tracing the benefit it provided to the  
8 Debtor's Estate. The Trustee is also concurrently investigating pre-petition and post-petition  
9 payments the Debtor made to UP and any possible related avoidance power claims.

10 M. UP has served subpoenas and filed notices of subpoenas to Amazon Web Services,  
11 Debt Pay Pro, Zoom Video Communications, Inc., LunaCRM, Morning Law Group, P.C. and  
12 Resolution Processing, LLC. *See* Dks. 1412, 1414, 1431, 1473. UP advises that it has not yet  
13 received responses to all the subpoenas.

14 N. On October 22, 2024, UP also subpoenaed the Trustee for a production of several  
15 categories of documents [*See* Dk. 1848] to which requests Trustee timely complied.

16 O. In light of their ongoing investigations, the Parties have agreed that a further  
17 continuance of the hearing on the Motion and related briefing schedule..

18 The Parties STIPULATE as follows:

19 1. The hearing on the Motion shall be continued from February 6, 2025 at 11:00 a.m., to  
20 March 13, 2025, at 11:00 a.m.

21 2. The deadline for Trustee to file a response to the Motion shall be extended through  
22 and including February 27, 2025.

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1           3.       The deadline for UP to file a reply to Trustee's response to the Motion shall be  
2 extended through and including March 6, 2025.

3           4.       This Stipulation may be executed in one or more counterparts, and facsimile or  
4 electronic signatures may be used in filing this document with the Court.

5  
6 DATED: January 16, 2025

MARSHACK HAYS WOOD LLP

/s/ Aaron E. de Leest

By: \_\_\_\_\_

D. EDWARD HAYS

AARON E. DE LEEST

ALINA MAMLYUK

Attorneys for Chapter 11 Trustee,

RICHARD A. MARSHACK

11  
12 DATED: January 20, 2025

GOLDEN GOODRICH LLP

13  
14 By: \_\_\_\_\_

DAVID M. GOODRICH

Attorneys for

UNITED PARTNERSHIPS, LLC

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STIPULATION TO CONTINUE HEARING ON MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE CLAIM FILED BY UNITED PARTNERSHIPS, LLC [DK. NO. 671]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 23, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST  
SUITE 100  
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 23, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA PERSONAL DELIVERY:**

**PRESIDING JUDGE'S COPY**

HONORABLE SCOTT C. CLARKSON  
UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
411 WEST FOURTH STREET, SUITE 5130 / COURTROOM 5C  
SANTA ANA, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 23, 2025  
Date

Layla Buchanan  
Printed Name

/s/ Layla Buchanan  
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

|                                                                                                                                                                            |                       |                                                                                                                                                                                                |
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|                                                                                                                                                             |                       |                                                                                                                                                             |
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|                                                                                                                                                                                |                         |                                                                                                              |
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.